### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,

Plaintiff,

٧.

Case Number:04-12299 MLW

. MOTION TO ADMIT
. COUNSEL PRO HAC VICE

- - MAID;

RECEIPT #

NEWPORT HOTEL GROUP, LLC, and JON E COHEN, DOUGLAS D. COHEN and RENEE COHEN, as Trustees of Hyannis Harborview Resort Condominium Trust

Defendants.

1/19/05

In accordance with 83.5.3(b) of the Local Rules of the United States District Court.

District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of **John Paul Fuller**, Esquire, 12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes of appearing as counsel on behalf of Plaintiff, George Iverson in the above-styled case.

John P. Fuller certified herewith that he has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; and is admitted to the United States District Court for the Southern, Middle and Northern Districts of Florida, as well as the United States Court of Appeals for the Fifth and Eleventh Circuits. Mr. Fuller's Florida Bar Number is 0276847. There are no disciplinary proceedings against Mr. Fuller in any jurisdiction. A certificate of good standing from the Supervisor, Membership Records of the Florida Bar is attached hereto as Exhibit A. Mr. Fuller is an associate with the law firm of Fuller, Fuller & Associates, P.A. An Affidavit of John Paul Fuller in Support of this Motion to Admit Counsel Pro Hac Vice is attached hereto as Exhibit B.

In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may

readily communicate and upon whom papers may be served.

Mr. Fuller is familiar with the Local Rules of the United States District Court for the District of Massachusetts and his application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiff George Iverson. Additionally, Mr. Fuller has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant John P. Fuller permission to appear before this Court pro hac vice.

#### CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the Plaintiff made a good faith attempt to obtain concurrence to the relief sought in this motion and counsel for defendant has been unavailable.

Respectfully submitted,

O. Oliver Wragg, Esquite

of Counsel

FULLER, FULLER AND ASSOCIATES, P.A.

(BBO#: 643152)

12000 Biscayne Blvd., Suite 609

North Miami, Florida 33181

Tel: (305) 891-5199

Fax: (305) 893-9505

I hereby certify that a true and correct copy of the foregoing has been furnished to Leonard H. Freiman; Goulston & Storrs; 400 Atlantic Avenue; Boston, MA 02110-3333; (617) 482-1776; (617) 574-4112. On this 1/2 day of /spv , 2005.



## The Florida Bar

JOHN F. HARKNESS, JR. EXECUTIVE DIRECTOR

651 East Jefferson Street Tallahassee, Florida 32399-2300

850/561-5600 www.FLABAR.org

State of Florida	)
County of Leon	)

In Re:

276847

John Paul Fuller

Fuller Fuller & Associates, PA 12000 Biscayne Blvd., Ste. 609

North Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on July 3, 1979.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

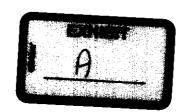
Dated this 9th day of December, 2004.

Willie Mae Shepherd

Supervisor, Membership Records

The Florida Bar

WMS/lpth7:R10



#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,					
Plaintiff,	. Case Number:04-12299 MLW				
v.  NEWPORT HOTEL GROUP, LLC, and JON E COHEN, DOUGLAS D. COHEN and RENEE COHEN, as Trustees of Hyannis Harborview Resort Condominium Trust	AFFADAVIT OF JOHN P. FULLER IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE				
Defendants.	•				
COMES NOW John P. Fuller and under oath do	es depose and say as follows:				
<ol> <li>I am a member of the bar in good standing in ev</li> </ol>	ery jurisdiction where I am				
admitted to practice.					
2. There are no disciplinary proceedings pending a	ngainst me in any jurisdiction.				
3. I am familiar with the Local Rules of the United States District Court of the					
District of Massachusetts.					
4. I am currently actively associated with O. Oliver	Wragg, Esq. who is a member of				
the bar of this Court.					
I hereby swear upon penalty of perjury that the foregoin	ng Declaration is true to the best				
of my knowlędge. \					
Date: 1 13 05					
John P.	Fuller, Ésquire				
STATE OF FLORIDA COUNTY OF MIDWY, DADE					
Sworn to (or affirmed) and subscribed before me this 13 da	y of January, 2005, by John P.				
My Cor	ca M Lichtenberger nmission DD138410 August 01, 2006				
Personally KnownOR Produced IdentificationProduced	Type of Identification				

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,	<del>-</del>
Plaintiff, v.  NEWPORT HOTEL GROUP, LLC, and JON E COHEN, DOUGLAS D. COHEN and RENEE COHEN, as Trustees of Hyannis Harborview Resort Condominium Trust	Case Number:04-12299 MLW  ORDER ON MOTION OF JOHN PAUL FULLER TO BE ADMITTED PRO HAC VICE
Defendants	

The motion for admission to practice <u>pro hac vice</u> in the above captioned matter is granted. The admitted attorney John P. Fuller is permitted to argue or try this particular case in whole or in part as counsel or advocate.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission <u>pro hac vice</u> for the above listed case will be made on the roll of attorneys.

The attorney admitted <u>pro hac vice</u> must serve a copy of this Order on all other counsel in this case.

Dated:		
	United States District Judge	

cc: John P. Fuller, Esq. Leonard H. Freiman, Esq. Court File